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through partnership

Amber S. Finch

Direct Phone: +1 213 457 8046

Email: afinch@reedsmith.com

Reed Smith LLP
355 South Grand Avenue
Suite 2900
Los Angeles, CA 90071-1514
+1 213 457 8000
Fax +1 213 457 8080
reedsmith.com

March 30, 2020

By ECF Filing

Hon. Paul A. Engelmayer
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square; Courtroom: 1305
New York, NY 10007

RE: *Roc Nation, LLC v. HCC International Insurance Company, PLC*; Case No.: 1:19-cv-00554

Dear Judge Engelmayer:

We write to request permission, pursuant to Section 4(B) of Your Honor's individual rules and practices, to file a redacted version of Roc Nation's letter motion seeking to compel production of documents improperly withheld by HCC and its accompanying exhibits as privileged.

The letter motion itself contains a description of testimony in a third party deposition marked confidential pursuant to the stipulated confidentiality order. Roc Nation contends that good cause exists for granting this request, allowing Roc Nation to file this document under seal as an exhibit to the Local Civil Rule 37.2 letter, because the testimony itself has been designated confidential pursuant to the Court's confidentiality order.

Furthermore, the letter motion attaches Exhibits A-M which contain confidential information that supports Roc Nation's contention that good cause exists for granting this request. Exhibit A is HCC's privilege log, which contains information and a description of HCC's internal emails that have been withheld based on privilege designations. Exhibits B-E are meet and confer correspondence concerning HCC business operations, and include documents that were part of the claim investigation with confidential information about Roc Nation's business practices. Exhibit F is an excerpt from the confidential corporate witness deposition of a non-party. Exhibits G-J are pre-denial investigation correspondence, which discuss details about Roc Nation's claim and reflect confidential business operations. Exhibits K-M are specific documents that HCC produced designated as confidential.

Roc Nation contends that good cause exists for granting this request, allowing Roc Nation to file this document under seal as an exhibit to the Local Civil Rule 37.2 letter, because the exhibits have all either been expressly designated to be confidential pursuant to the confidentiality order and/or contain private and confidential information exchanged between Roc Nation and HCC as part of the claim process and intended to be confidential at that time.

Thank you for addressing this request expeditiously.

Very truly yours,

/s/ Amber Finch

Amber S. Finch

Granted.

SO ORDERED.

A handwritten signature in blue ink that reads "Paul A. Engelmayer".

PAUL A. ENGELMAYER
United States District Judge

March 31, 2020